

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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IN RE:

IMPLEMENTATION OF THE FEDERAL
COMMUNICATIONS COMMISSION'S
TRIENNIAL REVIEW ORDER

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Docket No. 03-00460

T.R.A. DOCKET ROOM

PETITION TO INTERVENE OF ELECTRIC POWER BOARD OF CHATTANOOGA

Comes now the Telecommunications Division of the Electric Power Board of Chattanooga, a division of an independent board of the City of Chattanooga, Tennessee ("EPB Telecom") and pursuant to T.C.A. §4-5-310 and T.C.A. §65-2-107, and the Hearing Officer's Order dated August 19, 2003, petitions to intervene in this docket. In support of this Petition, EPB Telecom states as follows:

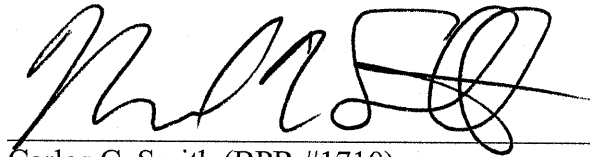
1. EPB Telecom is a certified competitive provider of local exchange telephone services, and EPB Telecom relies upon the unbundled network element platform in its operations.
2. EPB Telecom petitions to intervene in order to ensure that its interests are represented insofar as they relate to access to unbundled network elements and associated matters arising from issuance and implementation of the August 21, 2003 Triennial Order of the Federal Communications Commission.
3. As a certified competitive local exchange carrier, EPB Telecom's legal rights, duties, privileges, or other legal interests or responsibilities may be affected or determined by the outcome of this proceeding, and EPB Telecom's interests will not be adequately represented unless EPB Telecom is allowed to intervene.
4. EPB Telecom's participation will not impair the orderly and prompt conduct of the Authority's proceedings.

WHEREFORE, EPB Telecom prays that it be permitted to intervene in this proceeding and participate as a party; and it have such other and further relief to which it may be entitled.

Respectfully Submitted,

STRANG, FLETCHER, CARRIGER,
WALKER, HODGE & SMITH, PLLC

By:

A handwritten signature in black ink, appearing to be 'C. C. Smith', written over a horizontal line.

Carlos C. Smith (BPR #1710)

William C. Carriger (BPR # 1778)

Mark W. Smith (BPR #16908)

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